



Food Standards Guide: Butchers

Guidance on the requirements of food labelling and general food standards for butchers

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1.0 Foreword

This is a simplified guide covering the requirements of food labelling and general food standards for Butchers. Legislation may change over time and the advice given is based on the information available at the time this guide was produced. This guide is not intended to be a definite guide to the relevant law as only the Courts can interpret statutory legislation with any authority.

This document has been prepared by collaboration with the Scottish Food Enforcement Liaison Committee (SFELC) & Food Standards Scotland (FSS). It is a guide to food standards legislation in Scotland. It is not nor is it intended to be a substitute for legal advice. It is guidance only - it should not be relied upon or used for any other purpose.

2.0 Food Standards Working Group

This document was originally produced by the SFELC Food Standards Working Group which no longer exists. The list below details the participants at the time.

Thank you to all those involved in the creation of this guidance both within Group and out with the Working Group.

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3.0 Introduction

SFELC co-ordinates the food law enforcement, sampling and surveillance activities of Scottish local authorities and comprises representatives of central and local government, professional organisations, consumers and industry.

This guidance was prepared by the Food Standards Project Group, a short term sub-group of the SFELC FIIC. The Group's core objectives were to create resources to support Small to Medium Enterprises in understanding and complying with the requirements for food labelling, composition and quality, and to support understanding of, and consistency in, enforcing the requirements for food labelling, composition and quality.

Food standards legislation plays a large role in ensuring that the public can make informed decisions in relation to the food they choose to eat. Alongside informing customers, the legislation also protects public health, facilitates traceability and ensures fair trade.

This is a general guide to assist butchers to comply with all the relevant legislation when supplying food directly to the public, a caterer or a retailer.

4.0 Information Gathering / Good Manufacturing Practice

Information gathering is the starting point to ensuring good manufacturing practice. Some products delivered to you will have full labelling and others such as spices or premixes may only have the name of the food, the additives and allergens. All such information should be identified and gathered to help later in the food production process.

4.1 <u>Raw Materials and Product Specifications</u>

You must ensure that you have full information for all your ingredients and this must be provided by your supplier as a product specification if it is not all on the label. For meats you may require a specification that details the visual lean (VL) of the meat to ensure your calculations for meat content are accurate.

Packaging specifications must also be available. These should be obtained from your packaging supplier. Suppliers should be asked for the 'Declarations of compliance' which they are legally obliged to supply you with. This shows that the packaging is food grade and suitable for your use.

4.2 <u>Recipes</u>

Standard recipes are important to ensure consistency in the products you make. They will also allow you to identify all individual ingredients and allergens within the recipe which will help later. Detailed recipes are required to allow you to do correct calculations for meat content and quantitative indication declarations (QUID) for some other ingredients. Recipes should be written using the same measurement units throughout e.g. Kg. Having a recipe with, for example, a scoop of rusk, 5lb mince and 100g salt makes accurate calculation difficult.

Accurate recipes are required for all products where meat content will need declared and/or where a QUID declaration is required e.g. on prepacked foods. Ideally recipes will be held for all manufactured products.

To ensure consistency and quality of the product, it would be good practice to detail the manufacturing method too. This would help prevent significant variations.

Recipes should also detail what is to happen if an ingredient is not available, i.e. will this be substituted? You then have to query if this affects the final information given to the customer.

5.0 Production Processes

Good Manufacturing Practice must be followed throughout the whole manufacturing process, including storage of raw materials, intermediate products, finished products,

production and packing. You must ensure that all ingredients in the product are legally allowed to be contained in the product and not going to cause harm to the consumer.

Areas to consider are:

- Allergens time or total separation of specific allergen products e.g. gluten free; this includes the process of producing or using gluten free products
- Species cross contamination cleaning of equipment and time or physical separation of different species products;
- Unintentional/incorrect ingredients;
- Additives if they are permitted, maximum limits etc.;
- · Contamination with cleaning chemicals;
- Physical contaminants;
- Use of appropriate meat cuts/visual lean (vl);
- Legally named products (Section 5) Mince, Scotch pie, pork sausage etc.

5.1 <u>Traceability</u>

Under <u>Regulation 178/2002 on food safety</u> you must be able to identify the suppliers of all food/ingredients you have purchased and all businesses to which you have supplied food. In order to do this it is a good idea to retain invoices/receipts for any foods that you have purchased.

Additional information must be provided to businesses purchasing products of animal origin (POAO). Ensure your delivery notes and invoices have details of your business name and full address, an accurate description of the products, quantity of each product, date and a reference that can identify the lot, batch or consignment.

6.0 Food Information To Consumers

<u>Regulation 1169/2011 on the provision of Food Information to Consumers</u> outlines the majority of the labelling requirements for food. Other regulations outline specific requirements in relation to certain foods. Information provided must be clear, accurate, easy to read and understand and not be misleading. For example,

- Posters in the shop must not give the indication that all meat is Scottish if this is not the case.
- Claims cannot be made with regard to nutrition unless these can be substantiated.
- Products cannot be claimed as organic or gluten free where evidence cannot be produced in line with the specific requirements for these products.

As well as the content of the food, the way in which food is sold also affects the information that is required to be presented to the consumer.

This can be split into three main categories:

- non-prepacked/loose,
- prepacked and
- prepacked for direct sale (PPDS).

6.1 Non-prepacked/loose

Non-prepacked/loose includes food packed on the seller's premises at the customer's request. In a retail butcher environment non-prepacked/loose is likely to apply to most foods sold over the counter (e.g. mince, sausages, steaks, cold cooked meats, cheeses, pies and sausage rolls). In this situation, the name of the food, allergen information and meat content are required at the point of sale e.g. tray labels, signs.

Where non-prepacked/loose foods are sold to other businesses (although not explicitly required by regulations) additional information such as durability, storage conditions should also be provided with each delivery.

6.2 Prepacked

Prepacked includes any food put into packaging before being offered for sale through other caterers or retailers including those under the same business ownership. All the following must apply:

- The food cannot be altered without opening or changing the packaging;
- The product is ready for sale to the final customer or mass caterer.

Prepacked foods will include foods bought in that have been packed by your supplier and ready for sale to your customers.

Where food is prepacked and intended to be sold through a retailer, all of the mandatory information (section 4 of this guide) must be on the pack or attached label.

Distance sales, for example through the internet, are also required to have all mandatory information accompanying the food and be made available at point of delivery (e.g. via a menu, sticker).

Where prepacked food is sold to another business for further processing, all of the mandatory information must be provided, although some information can be included within commercial documents which accompany the food and not on the label attached to the food. For example, name of food, durability date, storage conditions and business details can be provided with the food, whereas other items may be provided via commercial documents.

In addition to the food information requirements detailed above additional food information can be provided on a voluntary basis as long as it accurate, does not confuse or mislead the consumer and meets the prescribed requirements and format outlined in the legislation.

6.3 Prepacked for Direct Sale

PPDS food is any single food item for presentation (to final consumers and to mass caterers) which consists of the food item and packaging which may enclose the food item completely or partially (but in such a way that the contents of the food item cannot be altered) and where the food item is put into packaging before being offered for sale by the same food business (presenting or offering to sell) the food item to the final consumer and to mass caterers

Foods prepared and packaged before sale to the final consumer by the same food business:-

- on the same food premises
- on the same site

- on other premises if the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) and the food is offered for sale by the same food business who packed it.

You must include the name of the food and an ingredients list on PPDS foods. In addition, any of the 14 allergens must be emphasised within the ingredients list. In depth PPDS guidance can be found here:- <u>PPDS_Guidance_-_04_May_2023.pdf</u> (foodstandards.gov.scot)

7.0 Minimum font size for labels

You must print all mandatory information on the package or on the label in characters using a certain font size to ensure the information is legible. The minimum font size is based on the pack surface area, not the label dimensions.

Surface area of the pack	Minimum required x - height	Mandatory Particulars			
Greater than or equal to 80cm ²	1.2mm	Full labelling.			
Between 25cm ² and 80cm ²	0.9mm	Full labelling.			
Less than 25cm ²	0.9mm	Exempt from mandatory nutrition labelling.			
Less than 10cm ²	0.9mm	Name, allergens, durability date and net quantity. Ingredients list to be available by other means or on request.			

Table 1. Minimum font size for labels



8.0 Mandatory Information

The following chapters cover the main areas of information which are required by law. These should help you comply with your labelling requirements.

8.1 Name of Food

When naming any food or food products that are produced and sold from your premises, you cannot make false claims or mislead the consumer (e.g. naming a product a Burger with less than 62% Beef). There are three types of names that can be given to foods packed by you that are sold from your premises: Legal, Customary, and Descriptive.

8.1.1 <u>Legal</u>

If a product has a legal name and your product meets the relevant compositional criteria, then this name must be used. The legal name and compositional requirements are set out under current UK legislation for that specific food e.g. Beef Burger, Bridie, Sausage.

8.1.2 Customary

If there is no appropriate legal name or your product doesn't meet the criteria of a legal name then a customary name may be used for the food. A customary name is a name that is accepted by consumers within the UK, or within the area of the UK where the

product is sold, as the name of a particular food without requiring any further explanation as to what the food actually is e.g. Toad in the Hole, Potted Meat, Lasagne, Beef Olives and Lorne Sausage.

8.1.3 Descriptive

If neither a legal or customary name can be applied to the food, a descriptive name should be given. This is a name that is suitable to indicate what the food actually is and to avoid confusion with other similar foods e.g. Pork in a Chinese Style Spiced Marinade, Chicken in a Barbeque Sauce.

A brand, sales or fancy name may only be used in addition to the legal, customary or descriptive name.

8.2 Voluntary Protected Food Names

Within the UK and the EU there are lists of protected legal food names. These are names that come under 1 of 3 categories. These are <u>not</u> mandatory but if you wish to use them on your product you must meet the following criteria and apply for permission from DEFRA.

8.2.1 Protected Designation of Origin (PDO)

For PDO status to be granted to a food or foodstuff, the product must be produced, processed and prepared within ONE geographical area and MUST have distinct characteristics from that area. For example, Orkney Beef, Orkney Lamb, Shetland Lamb.

8.2.2 Protected Geographical Indication (PGI)

For PGI status to be granted to a food or foodstuff, the product must be produced, processed and prepared with at least one stage of production, processing or preparation taking place in the area. For example, Cornish Pasty, Stornoway Black Pudding, Traditional Cumberland Sausage, Melton Mowbray Pie, the term 'Scotch' e.g. Scotch Beef/Scotch Lamb.

8.2.3 Traditional Specialty Guaranteed (TSG)

This is granted to products which either in their raw materials, production method or processing are traditional. This is used to differentiate the special characteristics of a product, from that of similar products, in that the raw materials, production method or processing have been consistent for a minimum of 30 years.

A list of protected food names used within the UK can be found on the gov.uk website, <u>Protected Food And Drink Names</u>

8.3 Product Specific Naming

8.3.1 Raw Meats

For raw/uncooked meats packed on and sold from your premises you must state the species of the meat and if it is any particular cut of meat i.e. beef fillet, pork loin.

8.3.2 Minced Meats

For minced meats, you must provide the species of meat used to produce the mince. If it is a mixture of species this must be stated e.g. beef and pork mince. Claims regarding minced meat can only be used if the fat & protein levels are below or equal to the following criteria levels.

Minced Meat Claim	Fat content (less than or equal to)	Collagen/Meat protein ratio (less than or equal to)
LEAN minced meat	7%	12%
Minced PURE beef	20%	15%
Minced meat – Contains PIGMEAT	30%	18%
Minced meat of other species	25%	15%

Table 2. Criteria levels for fat content in mince claims

Mince described as 'lean' or 'steak' mince must always comply with the standards in Table 2 above.

National Marks.

Within the UK, prepacked minced meat can be placed on the market if it doesn't meet the above compositional standards. There are strict criteria for this, agreed by the member states.

Other prepacked minced meat that does not comply with these compositional criteria may be placed on the national market only if labelled with a national mark and statements on the fat content and collagen/meat protein ratio.

Other minced meat sold loose which does not comply with the compositional criteria may be sold provided a national mark appears on a shelf edge label or notice near the food.

The national mark: **D** For UK market only

8.4 Products Containing Meat

The tables below show the minimum meat contents requirements for **meat products** (a product where the meat no longer has the characteristics of meat) and **meat preparations** (meat that has been made into a product still has the characteristics of meat). Legal names as mentioned above can only be used if the product meets the criteria for that name. If the meat content does not fulfil the criteria of <u>The Products</u> <u>Containing Meat etc. (Scotland) Regulations 2014</u> then you are committing an offence by calling the food by that name as you are misleading the consumer.

Table 3. Meat Contents	s Requirement for Legal Names (Meat Products)

Name of Food	Meat Contents Requirement for Legal Names (Meat Products)			
	Pig Meat only	Bird only or rabbit only or mixture of both	Any other species or mixtures (i.e. beef or lamb)	
Chopped (Meat) – e.g. Chopped Pork	75%	62%	70%	
Corned (meat) – e.g. Corned Beef	120% - Consist wholly of the corned (meat)& Fat Content must be below 15 %	120% - Consist wholly of the corned (meat)& Fat Content must be below 15 %	120% - Consist wholly of the corned (meat)& Fat Content must be below 15 %	
Luncheon Meat or luncheon (meat)	67%	55%	62%	
 'Game pie', 'Meat' pie or 'meat' pudding only – e.g. Steak Pie Based on uncooked weight Unless food weighs between 100-200g food weighs less than 100g Scottish/Scotch Pie 	10%	12.5% 11% 10%	10%	
 'pie' or 'pudding' – e.g. Chicken & Vegetable Pie or cheddar, broccoli and chicken parcel. Meat 'pie' or meat 'pudding' with 	10%	7% 6%	10%	
 something else Something else with Meat 'pie' or meat 'pudding' 	69/		6%	
Pasty, Pastie, Bridie, Sausage roll	6%	6%	6%	

Table 4 . Meat Contents Requirement for Legal Names (Meat Preparations)

Name of food	Meat Contents Requirement for Legal Names (Meat Preparations)		
	Pig Meat only	Bird only or rabbit only or mixture of both	Any other species or mixtures (i.e. beef or lamb)
Burger	67%	55%	62%
Economy Burger	50%	41%	47%
Hamburger	67%	N/A	62%
Pork Sausage/pork link/pork chipolata	42%	N/A	N/A
Sausage, link , chipolata, sausage meat	32%	26%	30%

8.5 Additional Information

When naming foods, under the following circumstances there are vital pieces of information you must **provide to accompany** the name of the foods:

- Meat products, preparations which contain added proteins from a different animal species must indicate in the name of the food the presence of those proteins and their origin. Added proteins can include: Albumin, collagen, casein, milk proteins and egg protein.
- Presence of water if the water added is above 5% of the whole product in meat products or preparations which have the appearance of a cut, joint, slice, portion or carcase of meat.
- Meat products/preparations which are combinations of several cuts of meat the term 'formed meat' must be used.
- If the food has undergone any treatment or the physical condition is different e.g. frozen, smoked the treatment should be stated in the name.
- The word 'defrosted' must be used if the food has been previously frozen plus a statement 'Do not refreeze.' Exceptions being: ingredients in a final product, where freezing is necessary, if defrosting the food will have no effects.
- Food treated with ionising radiation must state 'irradiated' or 'treated with ionising radiation'.
- Where genetically modified (GM) ingredients are used in food products, this information must be passed on to the customer as stated in Article 13 of <u>Regulation 1829/2003 on genetically modified food and feed</u>.

These further considerations can be included in a descriptive name on the back of the pack or under the name of the food.

In addition care must be taken when using the following descriptions to name foods you produce: Fresh, Traditional, Homemade, Farmhouse, Hand-made, Organic, and Premium/finest/quality/best. For further information on the use of the descriptions above, please contact your Local Authority.

8.6 List of Ingredients

Following the word "ingredients", you must list the specific name of all the ingredients of the food in descending order of weight at the time of manufacture. This is not required for single ingredient food e.g. beef steak, milk, eggs, whole fruit or vegetables.

If the product contains a compound ingredient (i.e. the ingredient itself contains more than one ingredient such as Rusk) each individual ingredient of that compound must be listed as an ingredient of the whole product or listed in brackets after the compound ingredient, e.g. Ingredients: Pork (70%) Rusk [**Wheat** flour, calcium carbonate, iron, niacin, thiamine, salt] water, white pepper.

However, unless it contains an allergen or additive, the ingredients of a compound ingredient or a mix of herbs and/or spices do not have to be given if that compound ingredient or mix makes up less than 2% of the overall product.

8.7 Substances Causing Allergy or Intolerance

There are 14 substances or products causing allergies or intolerance detailed below which consumers need to be advised of if they are contained in any foods that you use or produce. The format of how allergen information is provided depends on how the food is sold.

- Cereals containing gluten (e.g. wheat, barley, oats)
- Crustaceans
- Eggs
- Fish
- Peanuts
- Soyabean
- Milk
- Nuts (almond, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, Macadamia or Queensland nuts)
- Celery
- Mustard/mustard products
- Sesame seeds
- Sulphur dioxide and sulphites in concentration of more than 10 mg/kg or 10mg/litre (calculated in terms of the total sulphur dioxide)
- Lupin
- Molluscs

A product may not be declared free from an ingredient or allergen if that ingredient or allergen would not normally be found in that type of product.

Gluten Free/Very Low Gluten

'Gluten free' can only be used where there is 20ppm (parts per million) of gluten or less.

'Very low gluten' can only be used where there is 100ppm of gluten or less, however only foods with cereal ingredients that have been specially processed to remove the gluten may use the 'very low gluten' claim.

8.8 Allergen Information

For allergen considerations there is a technical <u>guidance document</u> that details more than the summaries below.

8.8.1 Non-prepacked/Loose

Allergen information must be available to consumers purchasing non-prepacked/loose foods. This can be done in writing, for example, in a menu. It can also be provided verbally, however you will need to provide signage to indicate that such information is available and how it can be obtained. Completion of an allergen <u>matrix</u> for all products and having it available for staff to refer to will assist you in complying with the requirements. A guidance <u>leaflet</u> is also available on allergen labelling of loose foods.

For Distance Selling i.e. takeaway deliveries, of food sold non-prepacked, allergen information should be made available by the FBO before the purchase is concluded, and be made available at point of delivery (e.g. via a menu, sticker).

<u>Menucal</u> is a free web tool which you can use to store your recipes securely and assist you to manage the allergens being used in the foods you produce.

8.8.2 Prepacked Foods

If a product itself contains, or uses a processing aid containing, any of the 14 allergens, those substances need to be declared within the ingredient list of the prepacked food in a font, style or colour that distinguishes them from other ingredients.

e.g. Ingredients: Beef flank (69%), rusk [**wheat** flour calcium carbonate, iron, niacin, thiamine, salt] water, white pepper, preservative sodium **metabisulphite**).

Where an ingredient comprises of several words only the allergen or cereal should be emphasised (e.g. skimmed **milk** powder). Seasonings that may not need to have their individual ingredients listed should be checked for the presence of allergens, as these allergens would need to be declared.

You may signpost where the allergen information is available e.g. 'For allergens see ingredients in bold'. Further statements such as 'contains wheat' is not permitted unless there is no requirement for an ingredient list for that particular food.

Voluntary use of the precautionary term 'may contain' to communicate the risk of the unintentional presence of an allergen is permitted provided a thorough risk assessment has been carried out and there is considered to be a real risk of cross contamination with the allergen, otherwise the statement could be considered misleading.

Further information on food allergies can be found on the <u>Food Standards Scotland</u> <u>website</u>.

8.8.3 <u>PPDS</u>

Allergens should be emphasised (highlighted, bold, underline etc) within the text of the ingredients list.

These need to be in line with the legal requirements that apply to naming foods and listing ingredients.

For more info there is PPDS Technical Guidance.

8.9 May Contain Statements/ Precautionary Allergen Labelling

The use of precautionary allergen labelling to communicate the risk of the unintentional presence of an allergen (e.g. milk, egg, peanuts, almonds) in a food product due to the allergen entering the product accidentally, or through cross contact, can be done on a voluntary basis. Such statements include 'may contain' or 'not suitable for...'. These statements should only be used after a meaningful risk assessment has been performed by your business and there is considered to be a significant and real risk to the food allergic or food intolerant consumer and cross contact cannot be avoided or discounted. If you choose to use voluntary labelling it must not mislead the consumer, must not be ambiguous or confusing, and where appropriate be based upon scientific data.

These statements should not be used as a substitute for good hygiene and safety practices. The use of precautionary allergen labelling when there is not a real risk could be considered to be misleading food information. Undertaking a risk assessment should help you identify risks that you can remove, perhaps by identifying and preventing opportunities for cross contact to occur.

It is important to note that any precautionary allergen labelling, e.g. may contain statements, provided by a supplier for any food products used within your recipes must be included within your PPDS label.

8.10 Genetically Modified Organisms (GMO)

If a product contains or is made up of genetically modified foods then you must inform the customer. There are slightly different labelling requirements whether the food is produced from or contains ingredients produced from GMO or product contains or consists of GMOs.

For GM on pre packed for direct sale where the food is produced from or contains ingredients produced from GMO then – labelling is still required unless surface area is less than $10cm^2$. Where there is no list of ingredients, the words 'genetically modified' or 'produced from genetically modified (name of organism)' shall appear clearly on the labelling. Loose/packages less than $10cm^2$ – this information shall be visibly displayed.

If the product contains or consist of GMO then the following descriptions should be made: 'This product contains genetically modified organisms' or 'This product contains genetically modified (*name of organism*)'.

Within a butchers, the most common use of GMO will be the vegetable oil that you use in recipes or used to cook food in.

Labelling of GMOs are regulated by <u>Regulation 1830/2003</u> the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms.

8.11 Compositional Standards/Quantitative Ingredients Declaration (QUID)

The <u>Food Information to Consumers Regulation 1169/2011</u> requires that the quantity of certain ingredients or categories of ingredients are declared for foods in the following circumstances:

- When the name of the ingredient features the name of food, or
- When the ingredient is normally associated with a food, or
- When the ingredient is emphasised on the labelling in words, pictures or graphics, or
- When the ingredient is essential to characterise the food.

The QUID should be declared as a percentage, which should be calculated as an ingredient at the time of manufacture or mixing bowl stage. For foods that are cooked the final weight, not pre weight, should be used in the QUID calculation to account for water lost from product during the cooking process. The QUID must appear on the label attached to the product or on a notice, ticket or label that is clearly visible to a consumer at the place where they choose that product (non-prepacked/loose). Meat must be declared by species. If two or more species are present each species must be declared separately.

In some cases where an ingredient is present in very small quantities (<2%) i.e. for flavouring purposes then the ingredient will not need a QUID. E.g. Pork, apple and sage stuffing.

8.11.1 Examples of products requiring QUID

Name of food	QUID required for		
	Prepacked food	Non prepacked food	
Pork sausage	Pork	Pork	
Pork and apple sausage	Pork and apple	Pork	
Pork and beef burger	Pork and beef	Pork and beef	
Steak pie	Beef	Beef	
Steak and kidney pie	Beef and kidney	Beef	
Macaroni pie	Macaroni	No QUID required	
Pork and green pepper stir fry	Pork and pepper	Pork	
Dry cured ham	Pork expressed as 'made with <i>x</i> g of pork per 100g of product'	Pork expressed as 'made with <i>x</i> g of pork per 100g of product'	

Table 5. Examples of products requiring QUID

8.11.2 Calculating QUID

Amounts of ingredients used at the mixing bowl stage should be used for calculating QUID.

Only meat that complies with the definition of meat should be used for calculating meat content. There are limits set for the amount of fat and connective tissue that can be counted towards 'meat'.

	Pork	Birds and rabbits	Beef, lamb and other species
Max fat %	30%	15%	25%
Max connective tissue %	25%	10%	25%

Table 6. Percentage of fat and connective tissue permitted in meat products

If the above limits of fat and connective tissue are exceeded, the QUID calculations must reflect this.

If visual lean (VL) for cuts used in manufacturing exceeds fat and/or connective limits then 'meat content' must be adjusted.

Column 1	How much of my ingredient counts as "meat"		
Visual Lean	Pork All other mammals		
(VL)		(Inc. Beef and Lamb)	
100	100	100	
95	100	100	
90	100	100	
85	100	100	
80	100	96	
75	96	90	
70	90	84	
65	84	78	
60	77	72	
55	70	66	
50	64	60	

Table 7. How much of ingredient counts as meat

8.11.3 Example of QUID calculation

Recipe		Calculation			Notes
Pork Sausage Pork Trim 85vl Rusk water	2.500 2.000	5.000 9.700 x	100	51.55 52%	The minimum required pork content in pork sausage is 42% so the product meets compositional standard. Weight of meat in recipe Total batch weight QUID declaration
Seasoning	0.200 9.700				

Table 8. Example of QUID Calculation – Pork Sausage

Table 9. Example of QUID Calculation – Pork & Beef Sausage
--

Recipe		Calcula	tion				Notes
Pork and beef Sausage kg/Lt		3.000	x	100	=	30.93	Weight of beef in recipe Total batch weight
Beef 85vl	3.000				=	31%	QUID declaration
Pork Trim 85vl Rusk	2.500 2.000	2.500 9.700	х	100	=	25.77	Weight of pork in recipe Total batch weight
water	2.000				=	26%	QUID declaration
Seasoning	0.200						
	9.700				Total	31%+26%	
						57%	The minimum required meat in a mixed species sausage is 30% therefore it meets the compositional standards for a mixed species sausage

Recipe		Calculati	on			Notes
Sausage Roll		6.000	x 100	96	 5.76 kg	With 75VL Pork we can only
Rusk	kg/Lt 15.000				Ŭ	count 96% as meat
Pork 75vl water	6.000 2.000	5.760 45	_ =	12.80%		Calculate the QUID by dividing the reckonable raw meat by the cooked weight of
Onion Seasoning	1.750 0.250 25.000					the product The minimum required meat in
Pastry	25.000					a sausage roll is 6% therefore it meets the compositional standards for a
Total Ingredients Total weight	50.000					sausage roll
after cooking	45.000					

Table 10. Example of QUID Calculation – Sausage Roll

Table 11. Example of QUID Calculation – Corned Beef

Recipe		Calculation				Notes
Recipe Corned Beef Beef 85 vl seasoning Total Cooked weight	kg/Lt 5.000 0.250 5.250 4.150	Calculation 5.000 4.15 x	100	=	120%	Calculate the QUID by dividing the raw meat by the cooked weight of the product The minimum required in corned beef is 120% therefore it meets the
						compositional standards for a corned beef QUID declaration: 120g beef used per 100g of product.

9.0 Net Quantity

All packaged foods of 5g or 5ml or more (except herbs and spices where there is no minimum threshold) are required to comply with <u>Regulation 1169/2011</u>.

These packages must display:

- the net quantity (g, kg, ml or l) directly on the package or an attached label
- drained net weight and net weight for foods packed in a liquid medium

Quantity information must:

- be accurate, clear and easy to understand
- be labelled in the same field of vision as name of food (and alcoholic strength if relevant)
- not be misleading

For more information on Net Quantity, please contact Trading Standards at your Local Authority.

10.0 Date of minimum durability - "Best Before", "Use By" and "Frozen On"

Most prepacked foods are required to be marked with a "use by" or "best before" date.

The information makes sure consumers are given advice on the safe shelf life of high-risk foods and also know when other foods can be eaten at their best quality.

This requirement for foods to have "Best Before" or "Use By" date does not apply for products sold non-prepacked/loose.

There is no legal requirement to apply a durability indication or instructions for use to food sold PPDS. However, it is best practice for some foods, such as vacuum packed foods, to be labelled with a durability indication and storage conditions to ensure food safety is not compromised.

10.1 <u>Use by</u>

The term "Use By" should be used for foods which are highly perishable and therefore likely, after a short period, to be unfit for human consumption. These are foods such as raw and cooked meats which have a limited shelf life beyond which they can deteriorate quickly allowing the growth of illness causing bacteria.

The "Use By" date should be marked as follows:

• "Use By"... followed by the date, or a reference to where the date is given on the label.

10.2 Best Before

The term "Best Before" is appropriate for the vast majority of foods, as it indicates the period for which a food can reasonably be expected to retain its optimal conditions and relates to the quality of food.

The "best before" date should be marked as follows:

- Best Before: followed by the date in the form of day, month and year
- Or Best Before End...followed by the date in the form of month and/or year (used when a date of the month is not needed).

The date can be replaced with a reference to where the date is given on label.

10.3 Frozen On

Where meat, meat preparations and unprocessed fishery products are frozen, the date of freezing should be given as follows:

• "Frozen on..." followed by the date or a reference to where the date is on a label. The date should be in the form of day, month and the year.

This requirement does not apply to non-prepacked/loose products.

WRAP have published <u>guidance</u> which gives best practice advice on food date labelling and storage advice.

11.0 Storage Conditions

Storage conditions and conditions of use require to be provided, where appropriate, to ensure the proper storage and use of the food.

Where appropriate, this should include:

- Instructions for storage and time limit for consumption after the packaging is first opened. E.g. "Store in a cool, dry place", "Refrigerate after opening" or "Use within 3 days of opening"
- Various options are available (e.g. "suitable for home freezing"); or
- Foods are not appropriate or suitable for certain circumstances (e.g. "not suitable for frying" or "shake well before use")

12.0 Business Details

The name of the business and a full postal address must be given.

13.0 Country of Origin – Certain Meats and Poultry

You must keep a record of information for the identification and traceability of chilled and frozen meat of swine, sheep, goat and poultry and retain each record for a period of 12 months from the end of the calendar year to which the record relates. This includes whole animals, portions, cuts and mince.

13.1 Non-prepacked/loose

The <u>Country of Origin of Certain Meat (Scotland) Regulations 2016</u> covers prepacked meats and poultry. It does not currently cover non-prepacked/loose products. If the meat, other than beef and veal, is presented without packaging at the point of sale e.g. on a counter display, origin labelling is not currently required.

13.2 Prepacked

Prepacked meats and poultry must be labelled with an indication of the place of rearing and the place of slaughter of the animal from which the meat is obtained (Origin can be used if the place of birth, rearing and slaughter are the same). This is the information that requires to be recorded from your supplier.

When you pack meat and it is sold onto other businesses, you are required to provide a batch code identifying the meat (such as a date mark or lot number). To do this, a record must be kept of the meat coming into the business. The required information should be found on the ticket/identification tag attached to the meat or on the case from the supplier.

Intake S	Intake Sheet						
Date	Supplier	Product	Place of Rearing / Slaughter / Origin	Supplier Batch Code	Internal Batch Code		
9/1/17	Meat Company	Chicken Fillets	0 – UK	17007	9Jan		
10/1/17	Slaughter Co.	Pig side	R-Ireland S- UK	7009	10Jan		
10/1/17	Pork Farm Co.	Pork Loins	R-Ireland S-UK	17010	10Jan1		

Figure 1. Example of intake sheet

When meat is packed and distributed to other businesses, the country of origin information must be passed on along with the internal batch code that can link it back to the original supply (as well as the general food labelling requirements).

Figure 2. Example of label indicating country of origin and batch code

Chicken Fillets

Lot: 9Jan

Origin: UK

Pork Fillets

Lot: 10Jan1

Reared in: Ireland

Slaughtered in: UK

Minced meat and trimmings are permitted to be labelled in a more generic manner (e.g. Reared in: non-EU country) if more specific information as to their origin is not available.

14.0 Instructions for Use

Instruction for use must be given if it would be difficult to make appropriate use of the food without them.

Any instructions for use given should be sufficiently detailed to enable appropriate preparation or use to be made of the food i.e. the correct time/temperature given for safe cooking of raw poultry meat or meat products.

15.0 Nutrition information for Butchers

Since December 2016 the requirement for mandatory nutrition declarations has applied to most prepacked foods under The Food Information to Consumers <u>Regulation</u> <u>1169/2011</u>. Non-prepacked/loose food does **not** need to be accompanied with nutritional information but if you decide to voluntarily provide nutritional information, you must provide it in the prescribed format was shown in section 15.

Nutritional information is required for certain business whose food is sold through 3rd parties which are outside your locality. To see if foods which you provide need to carry nutritional information, please follow the flow chart below.

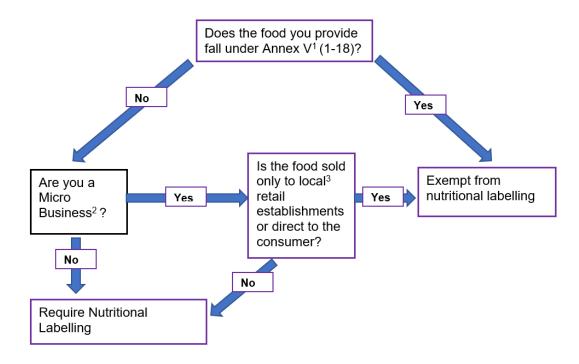


Figure 3. Flow chart to indicate requirement of nutritional information

<u>**1Annex V**</u> (1-18) The Food Information to Consumers Regulation <u>1169/2011</u>. (See appendix 1 of this document for a copy of the list).

²Micro business have less than 10 full time equivalent employees and a turnover of less than ± 1.7 m.

³Local is interpreted as: within the manufacturer's local authority and the neighbouring local authority area or within 30miles from the border of the manufacturer's local authority area if this is greater.

15.1 Nutrition Mandatory requirements

If the food you provide does not have an exemption, you must present the nutrition declaration in tabular format. Where space does not permit, the declaration may appear in a linear format. The following declarations must be present and appear in the following order and in the same field of vision. Values must be displayed as per 100g/ml. Energy must be displayed as both kJ and kcal.

Mandatory Nutritional Information (**Black**) is information which must be included when a nutritional declaration is required. Supplementary nutritional information (*Red*) may also be included in the format below:

	Per 100g/100ml
Energy - kcal/kJ	xxxxkcal
	xxxxkJ
Fat	xxg
of which saturates	xxg
of which monounsaturates	xxg
of which polyunsaturates	xxg
Carbohydrate	xxg
of which sugars	xxg
of which polyols	xxg
of which starch	xxg
Fibre	xxg
Protein	xxg
Salt	xxg

Under certain circumstances, the provision of information on some of these supplementary nutrients may become mandatory. This would arise if a nutrition or health claim is made for one of the supplementary nutrients.

15.2 Nutritional values

The nutritional value should be for the food as sold or after cooking provided that sufficient cooking instructions are provided.

The values may be obtained by analysis of the food or can be calculated based on the values for the ingredients present in the food either manually, or using computer programmes such as: <u>https://www.alacalc.com/, http://nutricalc.co.uk/, https://www.fooddataservices.co.uk</u> or calculation from generally established data, such as <u>Composition of foods integrated dataset</u>.

In addition mandatory Nutritional Information can also be expressed as %RI (reference intake) provided that the statement "Reference Intake of an average adult (8400kJ/2000kcal)" is made.

15.3 Per Portion Nutrition Information

You may give nutrition information per portion (e.g. quarter steak pie) and/or per consumption unit (e.g. one sausage), as long as this information is given in **addition** to the mandatory per 100g or 100ml information. When doing so you must also quantify the portion or consumption unit used on the label in close proximity to the nutrition declaration along with the overall number of portions contained in the package.

For further information on nutrition declarations you may wish to refer to the <u>FSS</u> website.

Or go directly to the Department of Health Technical guidance on nutrition labelling.

15.4 Voluntary Front of Pack (FoP) Nutrition Labelling

In addition, on a voluntary basis, selected elements of the nutrition information may be repeated in the principal field of vision (front of pack) in order to help consumers to easily see the essential nutrition information when purchasing foods. The following information may be repeated:

(a) Energy value alone; or

(b) Energy value together with fat, saturates, (total) sugars, and salt (energy +4)

Each grilled burger (94g) contains

Energy 924kJ 220kcal	13a	Saturates 5.99	Sugars 0.8g	Salt 0.7g
11%	19%	30%	<1%	12%

of an adult's reference intake Typical values (as sold) per 100g: Energy 966kJ / 230kcal

You can provide FoP nutrition information in the following formats:

- per 100g or per 100ml only (applies to energy value alone and energy +4),
- per 100g or per 100ml plus per portion and/or per consumption unit (applies to energy value alone and energy +4)

There is more detailed <u>Front of Pack nutrition labelling guidance</u> available to help businesses to produce a 'front-of-pack' label.

16.0 Nutrition and Health Claims

If you intend to make nutritional or health claims you must follow the rules governing such claims. Voluntary nutrition or health claims must comply with the requirements of the <u>Nutrition and Health Claims Regulation 1924/2006</u>.

Claims must comply with the general rules which include not being false, ambiguous or misleading; not encouraging or condoning excess consumption of a food; and not implying that a balanced diet cannot provide necessary nutrients. For claims regarding allergens, see section 8.9.

16.1 Health Claim

A health claim is any claim which states, suggests or implies that health benefits can result from consuming a given food, such as "helps build strong bones", "helps maintain normal blood cholesterol levels". The Regulation also controls general references to overall health and well-being, such as "healthy" or "superfood". Regulation <u>1924/2006</u> applies to claims made in commercial communications, including labels, leaflets, menus, adverts and websites. The list of permitted health claims as well as newly authorised health claims can be found in the <u>Great Britain Nutrition and Health Claims Register</u>. (GB Register).

New health claims must be authorised and included in the list of authorised health claims in the GB Register **before** they can be used.

16.2 Nutrition Claims

A nutrition claim is a claim that states, suggests or implies that a food has beneficial nutritional properties, such as, "low fat" or "high in protein". Only nutrition claims in the GB Register can be made and only if a product meets with the specific conditions of use for that claim. For example, "low fat" can only be made on a product containing no more than 3g of fat / 100g (for a solid) or no more than 1.5g fat / 100ml (for a liquid). The GB register of authorised claims is on the <u>UK Government website</u>. Department of Health Guidance have guidance available on their website for <u>Nutrition and Health</u> <u>Claims, Guidance To Compliance</u>.

17.0 Additives in Foods

A Food Additive is a substance not normally eaten as a food itself but added to carry out a particular function e.g. colours, sweeteners and preservatives.

Most of the additives used in small/medium butchers will come from seasonings. There are restrictions on what additives can be used in certain foods and some have maximum permitted levels. The restrictions are in place to ensure that there are no health concerns with the additive consumption. <u>Regulation (EC) No 1333/2008 on food additives</u> determines what can be used, in which type of food and to which level.

For example, the maximum permitted level, available from all sources, of the eight additives making up the sulphites group of preservatives, which includes sulphur dioxide (SO₂), is 450mg/kg for breakfast sausages. The additives may be added individually or in combination. Maximum levels are expressed as SO₂ and relate to the total quantity, available from all sources, an SO₂ content of not more than 10 mg/kg is not considered to be present. An exception is that the presence of sulphites used as a preservative in amounts greater than 10mg/kg or 10mg/l which will need to be declared as an allergen, whether present due to carry over or deliberately added.

Therefore, even if you are not adding any of them to your sausages you will still need to ensure that if they are contained in any of the ingredients used that they will not be present above this level.

The same conditions of use for sulphites apply to burger meat with a minimum vegetable and/or cereal content of 4% mixed within the meat. Sulphites are not permitted to be added to minced meat.

For prepacked foods, additives must be stated in the ingredient list by their function and their name or E number unless they are carried over into the final product from a compound ingredient and do not serve any function in the final product.

e.g. Pork (87%), water, salt, preservatives (sodium nitrate, potassium nitrate), antioxidant (sodium ascorbate).

Additives which are used as processing aids are also exempt from the need to be mentioned in the ingredient list.

There is no requirement for additives to be declared for loose foods with the exception of SO₂ as an allergen if it's present above 10mg/kg.

For more detailed advice please visit the Food Standards Agency's <u>Food Additives</u> <u>Legislation Guidance to Compliance</u> which contains information on guidance on the definitions of "meat preparations" and "meat products", additives permitted in meat preparations and authorised levels of nitrates and nitrites in meat products, including traditional meat products.

18.0 Beef Labelling

The beef labelling scheme places certain requirements on all food businesses whose trade involves the sale or distribution of fresh or frozen beef and veal.

A record must be kept of all beef and veal received. This can be done by keeping the tag from the side of beef or primal cut or the box label, photographing the information and storing it available for inspection or creating an intake record that must be maintained on the premises showing the reference number/code, slaughterhouse and cutting plant licence numbers of the incoming beef.

Example In	Example Intake Sheet					
Date	Supplier	Product	Place of Birth / Raised / Slaughtered	Supplier Batch Code / Reference	Internal Batch Code	
10/1/20XX	Slaughter Co. UK5678	Beef side	Origin – UK (can be used if all 3 above are the same)	Slaughtered in:UK1234 7009 (from tag on carcass)	10Jan	
10/1/20XX	Beef Farm Co. UK4321	Beef trimming	Born- IE Raised-IE Slaughtered-UK	Slaughtered in:UK8765 17010 (from box)	10Jan1	

The requirements will vary depending on the circumstances in which the beef is sold but in the case of a retail butcher where cut beef, mince beef or veal is displayed loose or unpackaged then the individual tickets and or information board must state the following:

Example 1

Origin : United Kingdom Slaughtered in : United Kingdom Cut (or minced) in : United Kingdom Ref:10Jan

Example 2

Born in : Ireland Reared in: Ireland Slaughtered in : United Kingdom Cut (or minced) in : United Kingdom Ref:10Jan1

Example 3

Origin: UK Slaughtered in: UK (1234) Cutting in (or Cut in): UK (5678) Ref:10Jan

If beef is cut in non-approved premises, for example, butchers, farm shops or other shops, the address of the premises must be shown instead of an approval number. But where the beef is cut and sold in the same non-approved premises, the label may say 'on these premises'.

The intake records (in whatever form) must be available for customer information if requested. If there is any change in the country of origin or the country where the animal was slaughtered or cut, then the labelling of the beef in question would have to accurately reflect this. Batches of cut meat can only be made up from a maximum of three slaughterhouses or cutting plants. Mince must originate from one country only.

When providing other businesses with prepacked cut or minced beef a label must be applied and contain the following information as well as the general food labelling requirements information. The <u>Scottish Government Beef Labelling Guide</u> explains the requirements in full.

Appendix 1: Regulation 1169/2011 on the provision of food information to consumers. Annex V

Foods which are exempt from the requirement for mandatory nutrition declarations:

- 1. Unprocessed products that comprise a single ingredient or category of ingredients;
- 2. Processed products which the only processing they have been subjected to is maturing and that comprise a single ingredient or category of ingredients;
- 3. Waters intended for human consumption, including those where the only added ingredients are carbon dioxide and/or flavourings;
- 4. A herb, a spice or mixtures thereof;
- 5. Salt and salt substitutes;
- 6. Table top sweeteners;
- Coffee extracts and chicory extracts, whole or milled coffee beans and whole or milled decaffeinated coffee beans;
- Herbal and fruit infusions, tea, decaffeinated tea, instant or soluble tea or tea extract, decaffeinated instant or soluble tea or tea extract, which do not contain other added ingredients than flavourings which do not modify the nutritional value of the tea;
- 9. Fermented vinegars and substitutes for vinegar, including those where the only added ingredients are flavourings;
- 10. Flavourings;
- 11. Food additives;
- 12. Processing aids;
- 13. Food enzymes;
- 14. Gelatine;
- 15. Jam setting compounds;
- 16. Yeast;
- 17. Chewing-gums;
- 18. Food in packaging or containers the largest surface of which has an area of less than 25 cm $^{\rm 2}$
- 19. Food, including handcrafted food, directly supplied by the manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer.

Appendix 2:

Labelling Requirements Table

Table 13. Labelling requirements for food sold from your own business

Any Food Sold direct	Any Food Sold directly to customer either loose, prepacked or PPDS where product is made							
	e.g. steak pie made in one shop and sold from same shop / raw meat sold loose in shop							
	Details required	Format	Comments					
Non- prepacked/loose	Name of food (<i>Must be</i> beside the food may need to change layout so it is clear)	On the counter ticket or label attached to food	Name must be beside the food					
	Meat species and content % (QUID)	On the counter ticket or label attached to food, notice or poster	Notices/posters must be readily discernible to customers at the place where they choose their food					
	Allergens	On the counter ticket or label attached to food, notice or poster	Allergen info can be provided verbally provided that a notice is displayed, for example 'For allergen information ask member of staff'					
Prepacked supplied to other businesses	All mandatory information: Name of food List of ingredients Allergens highlighted QUID where necessary Country of origin or provenance if necessary Net quantity Durability 'best before' or 'use by' Storage conditions Business name and address Instruction of use e.g. cooking/reheating instructions Nutritional declaration (if applicable)	On the packaging, or label attached to the pack	Additional information must be provided for some foods, for example: Mince: fat & protein: collagen ratio Frozen meat, meat preparations & fish: date of freezing					

Additional requirements for beef	Origin or - place of birth and place of rearing and place of slaughter Slaughter: country and plant number Cutting: country and plant number	On a label, or Counter, ticket/label, notice, or poster	Notices/posters must be readily discernible to customers at the place where they choose their food
Additional requirements for country of origin of certain meats & poultry (<u>Only prepacked</u> <u>meats</u>)	Country of rearing Country of slaughter 'Origin' can be used if country of birth, rearing & slaughter are the same Batch code	On packaging	Records should be kept for any meats under this category coming into your business
PPDS (Label)	Name of Food List of Ingredients Allergens highlighted	On Packaging	Refer to PPDS Guidance

Supplied to Caterers

Table 14. Labelling Requirements for food sold to other caterers

Any food supplied to caterers where food will undergo further processing						
e.g. steak pie filling prepared in one shop then sold to caterer for final preparation						
	Details required	Format	Comments			
Prepacked, including vacuum packed	All mandatory information: Name of food List of ingredients Allergens highlighted QUID where necessary Country of origin or provenance if necessary Net quantity Durability 'best before' or 'use by' Storage conditions Business name and address Instruction of use e.g. cooking/reheating Nutritional declaration (if applicable)	Option 1: all information provided on the pack or a label attached Option 2: Name of food, and Durability, and Storage conditions, and Name and address of the business on the outer pack and other details either on a) the delivery note at the time of delivery, or b)a specification supplied before delivery	Additional information must be provided for some foods, for example: Mince: fat & protein: collagen ratio Frozen meat, meat preparations & fish: date of freezing A specification should be provided in advance before the start of supply. Specifications should be accurate and updated when necessary e.g. when you change ingredients, recipes.			
Non-prepacked	Name of food, and Allergens, and Meat species and content (QUID)	On a label attached to food, or Notice such as delivery notice	Although not explicitly required by regulations, additional information such as durability date and storage conditions should also be provided with each delivery.			
Information on origin of meat	Origin or - place of birth and place of rearing and place of slaughter Slaughter: country and plant number Cutting: country and plant number	On the pack, delivery note or invoice	Traceability information for meat must be provided at each stage of supply.			

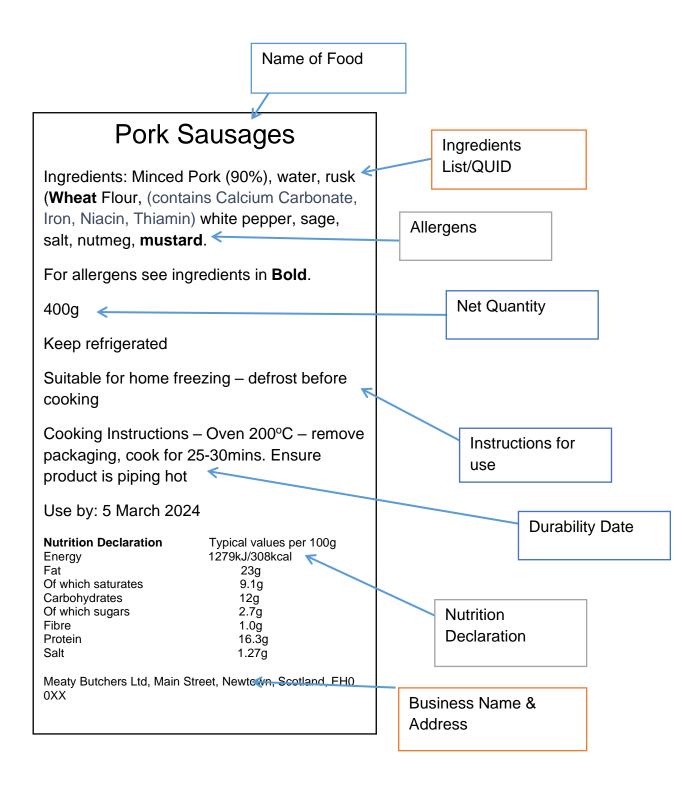
Any food supplied to businesses for retail to final consumer without further processing					
E.g. cooked meat sliced and packed in one shop – sold to other shop i.e. retailer and sold as it was when first packed					
	Details required	Format	Comments		
Prepacked, including vacuum packed	All mandatory information: Name of food List of ingredients Allergens highlighted QUID where necessary Country of origin or provenance if necessary Net quantity Durability 'best before' or 'use by' Storage conditions Business name and address Instruction of use e.g. cooking/reheating instructions Nutritional declaration (if applicable)	On the pack or a label attached	Additional information must be provided for some foods, for example: Mince: fat & protein: collagen ratio Frozen meat, meat preparations & fish: date of freezing		
Non-prepacked	Not specified in regulations however you should provide all information that must be provided to a consumer by a retailer of non- prepacked food: Name of food, and Allergens, and Meat content (QUID)	Not specified however in practice non- prepacked food should be labelled with at least the name of food and the other information can be provided with delivery note or as a specification.	Although not explicitly required by regulations, durability date and storage conditions should be also provided with each delivery.		
Information on origin of meat	Origin or - place of birth and place of rearing and place of slaughter Slaughter: country and plant number Cutting: country and plant number	On the pack, delivery note or invoice	Traceability information must be provided at each stage of supply.		

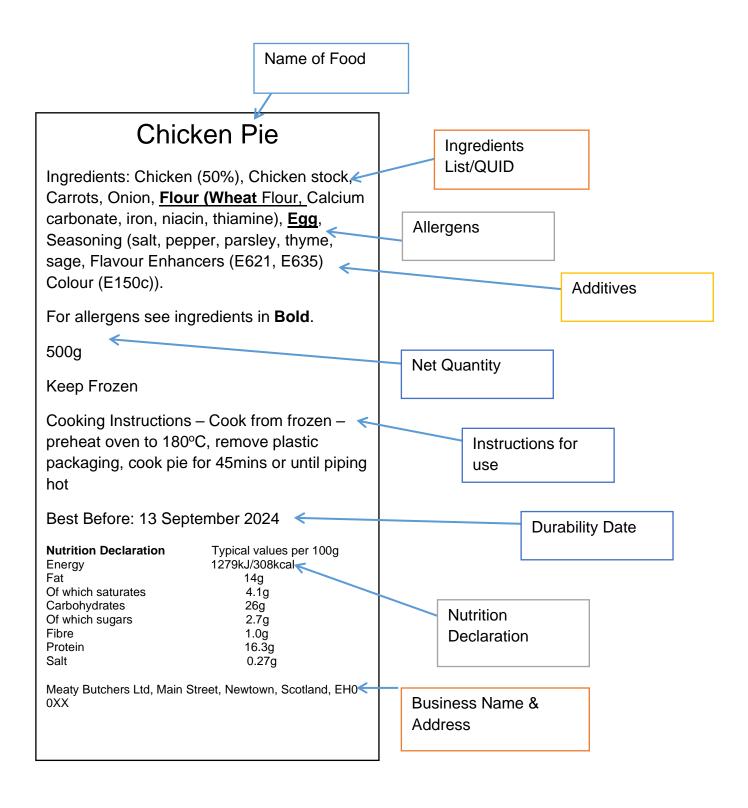
Table 15. Labelling Requirements for food sold to other retailers

Any food supplied to other processors: sufficient information must be provided to enable businesses to comply with food information/labelling requirements at each stage of supply.

Example Label

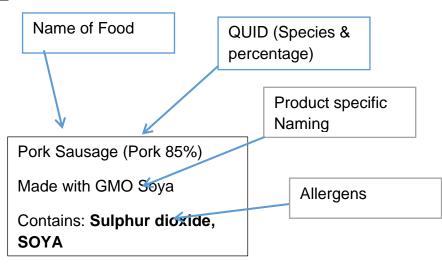
Prepacked						
	Name of Food					
Steak Pie Ingredients: Beef Steak (50%), Beef stock, Carrots, Onion, <u>Flour (Wheatflour,</u> Calcium carbonate, iron, niacin, thiamine), <u>Egg</u> , Seasoning (salt, pepper, parsley, thyme, Flavour Enhancers (E621, E635) Colour		Ir	ngredients			
		List/QUID Allergens				
(E150c)). For allergens see in Bold .	ngredients in			Ado	litives	
500g <						
Keep refrigerated		Net Quantity				
Cooking Instructions – prehea 180°C, remove plastic packag for 45mins or until piping hot			Instruction	ons for	7	
Use by: 13 Dec 2019						
Energy130kJ/12Fat15Of which saturates26Carbohydrates32Of which sugars26Protein33Salt22Meaty Butchers Ltd, Main Street, Newton	5g 8g 5g 0g 0g 2.0g		Autrition Declaration	Durability	ility Date	
0XX	K			0		
		Addre	ess Name o ss	X		



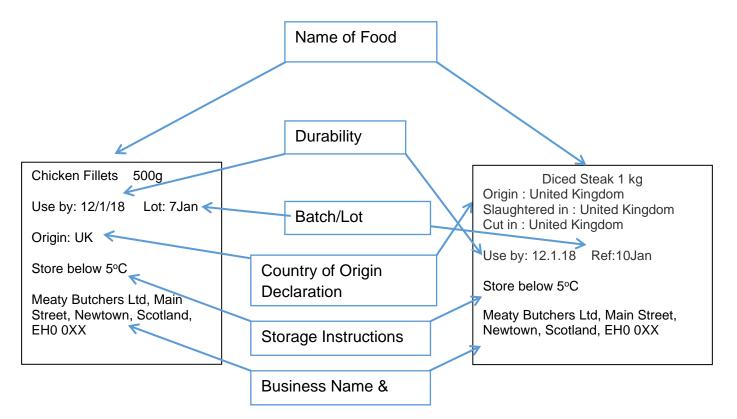


Loose/ Prepacked for Direct Sale

<u>Loose</u>



Fresh Meat – sold packed from one business to another



PPDS Label Examples

Sausage Roll

INGREDIENTS: Wheat Flour (Wheat Flour, Calcium Carbonate, Iron, Niacin, Thiamin), British Pork (12%), Pork Fat (5%), Vegetable Oil (Palm, Rapeseed), Water, Egg, Salt, Potato Starch, Milk, Spices, Herbs, Mustard

Beef Burger

INGREDIENTS: *Beef Burger* [Beef (75%), Water, Rice Flour, Salt, Onion Powder, Dextrose, Sugar, Yeast Extract, Black Pepper, Sunflower Oil, Paprika, Vegetable Fibre, Preservative (**Sodium Metabisulphite**), White Pepper, Bay, Black Pepper Extract, Flavouring],

Allergy advice: for allergens, including milk, see ingredients highlighted in **bold**